

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION**

DEBBIE PLUCKER,

Plaintiff,

vs.

UNITED FIRE & CASUALTY COMPANY,

Defendant.

Civ. 12-4075

**AFFIDAVIT OF ROBERT D. TRZYNSKA
RE: REPLY IN SUPPORT OF
PLAINTIFF'S MOTION TO COMPEL**

STATE OF SOUTH DAKOTA

)

: SS

COUNTY OF MINNEHAHA

)

Robert D. Trzynka, after being duly sworn upon his oath, states as follows:

1. I am one of the attorneys representing Debbie Plucker in the above-captioned lawsuit. I possess personal knowledge of the issues stated herein and have made due inquiry as to their status as of the date of this affidavit.

2. True and correct copies of the following documents are referenced in the Reply in Support of Plaintiff's Motion to Compel:

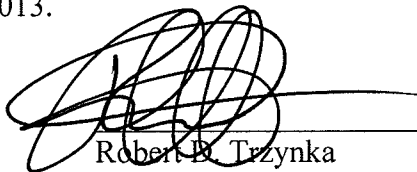
A. Exhibit A is a true and correct copy of excerpts from Sniffen Personnel File and is filed under seal pursuant to Protective Order [Doc. 13];

B. Exhibit B is a true and correct copy of excerpts from Wade Personnel File and is filed under seal pursuant to Protective Order [Doc. 13];

C. Exhibit C is a true and correct copy of excerpts from Schares Personnel File and is filed under seal pursuant to Protective Order [Doc. 13]; and

D. Exhibit D is a true and correct copy of excerpts from Employee Handbook and is filed under seal pursuant to Protective Order [Doc. 13].

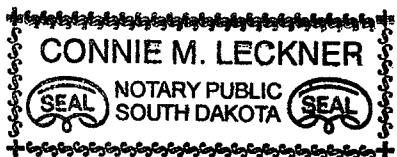
Dated this 19th day of December, 2013.


Robert D. Trzynka

Subscribed and sworn to before me
this 19th day of December, 2013.

Connie M. Leckner
Notary Public – South Dakota
My Commission Expires:

[SEAL]



CERTIFICATE OF SERVICE

I certify that on the 19th day of December, 2013, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the appropriate parties:

Lon Kouri
lkouri@mayjohnson.com

Eric DeNure
edenure@mayjohnson.com

/s/ Robert D. Trzynka
Michael D. Bornitz
Robert D. Trzynka
Cutler & Donahoe, LLP
100 N. Phillips Avenue, 9th Floor
PO Box 1400
Sioux Falls, SD 57101-1400
Telephone: (605) 335-4950
Facsimile: (605) 335-4961
MikeB@cutlerlawfirm.com
BobT@cutlerlawfirm.com
Attorneys for Plaintiff